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REMARKS

In response to the final Office action of May 1, 2007, Applicants ask that all claims be allowed in view of the following remarks. Claims 1 and 5-31 are currently pending, of which claims 1, 16, 25, and 26 are independent. Claim 1 has been amended, and claims 2-4 have been cancelled. Applicants respectfully request entry of the amendment to claim 1 reflected in the above listing of claims as the amendment does not raise new issues. In particular, claim 1 has been amended to include the features of claim 4, which previously depended directly from claim 1. Therefore, no new matter has been added and no new issues have been raised by the amendment.

Of the pending claims, claims 1 and 5-31 stand rejected as being unpatentable over Griffin (U.S. Patent Application No. 2002/0178119). Applicants request reconsideration and withdrawal of this rejection because Griffin does not describe or suggest the subject matter of independent claims 1, 16, 25, and 26, as described below.

For example, independent claim 16 recites, *inter alia*, accessing a characteristic method data entry identified by an access control rule data entry. The characteristic method data entry identifies a method to determine a characteristic for a user and identifies a method to determine a characteristic for a data object. The characteristic for the user is determined by performing the method to determine the characteristic for the user identified by the characteristic method data structure and the characteristic for the data object is determined by performing the method to determine the characteristic for the data object identified by the characteristic method data structure.

Griffin does not describe or suggest accessing a characteristic method data entry that identifies a method to determine a characteristic for a user and identifies a method to determine a characteristic for a data object, as recited in independent claim 16. Nor does Griffin describe or suggest determining the characteristic for the user by performing the method to determine the characteristic for the user identified by the characteristic method data structure and determining the characteristic for the data object by performing the method to determine the characteristic for the data object identified by the characteristic method data structure, as also recited in independent claim 16.

In contrast, the system of Griffin generates access control information by associating users with roles and resources with capabilities. See Griffin at paragraph [0038]. Specifically, the system of Griffin associates a principal with a role by comparing attributes of the principal with a role filter and associates a resource with a capability by comparing attributes of the resource with a capability filter. See Griffin at paragraph [0048]. Associating a principal with a role and associating a resource with a capability provides access control because the roles and capabilities have a pre-defined access relationship (e.g., a role is composed of a set of one or more capabilities). See Griffin at paragraph [0038]. The system of Griffin, however, does not describe accessing a characteristic method data entry that identifies both a method to determine a characteristic for a user and identifies a method to determine a characteristic for a data object. In particular, neither the roles, capabilities, nor any other data described in Griffin identifies a method to determine any type of characteristic, much less a method to determine a characteristic for a user and a method to determine a characteristic for a data object. Rather, the roles and capabilities include data defining access rules for principals and resources based on characteristics associated with the principals and resources, but fail to include any data related to identifying a method to determine the very characteristics on which the access rules are based.

Notably, the Office action fails to specifically address the features recited in independent claim 16. Instead, the Office action includes a statement that the "[l]imitations of claim 16 are substantially the same as limitations of claim 1." See final Office action of May 1, 2007 at page 10. This is incorrect and improper.

For example, independent claim 16 recites "a characteristic method data entry identifying a method to determine a characteristic for a user and identifying a method to determine the characteristic for a data object," "determining the characteristic for the user by performing the method to determine the characteristic for the user," "determining the characteristic for the data object by performing the method to determine the characteristic for the data object," and "generating access control information that permits the user to access the data object conditioned on the characteristic for the user being the same as the characteristic for the data object." These features of claim 16, for example, are not recited in independent claim 1. Therefore, Applicants submit that the limitations of claim 16 are not substantially the same as limitations of claim 1 and making an assertion that they are does not adequately address the features of claim 16.

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Furthermore, the Office action states that identifying a method to determine characteristics "is just another layer of searching and linking on the items stored on a database management system" and cites paragraph [0007] of Griffin stating that "Griffin teaches addition of a new layer of abstraction." See final Office action of May 1, 2007 at page 10. Paragraph [0007], however, describes that using roles to define access controls provides an additional layer of abstraction that reduces administrative costs and provides easier management of access control systems. As such, the additional layer of abstraction does not relate to a method to determine a characteristic and does describe or suggest accessing a characteristic method data entry that identifies <u>a method to determine a characteristic for a user</u> and identifies <u>a method to determine a characteristic for a data object</u>.

Therefore, for at least the reasons discussed above, Griffin does not describe or suggest accessing a characteristic method data entry that identifies <u>a method to determine a characteristic for a user</u> and identifies <u>a method to determine a characteristic for a data object</u>, as recited in independent claim 16. Because Griffin does not describe or suggest accessing a characteristic method data entry that identifies a method to determine a characteristic for a user and identifies a method to determine a characteristic for a data object, Griffin necessarily cannot describe or suggest determining the characteristic for the user by <u>performing the method</u> to determine the characteristic for the user identified by the characteristic method data structure and determining the characteristic for the data object by <u>performing the method</u> to determine the characteristic for the data object identified by the characteristic method data structure, as also recited in independent claim 16.

Accordingly, for at least these reasons, Applicants request reconsideration and withdrawal of the rejection of claim 16 and its dependent claims 17-24 and 27-31.

Independent claim 26 recites features similar to those discussed above with respect to claim 16, and does so in the context of an apparatus. Accordingly, for the reasons discussed above with respect to claim 16, Applicants request reconsideration and withdrawal of the rejection of independent claim 26.

Independent claim 1 recites, *inter alia*, access control group data that includes at least one entry in the access control group data including <u>a user characteristic</u> for use in determining at least one entry in the user access data relating to the at least one entry in the access control group

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data and an object characteristic for use in determining at least one entry in the data object access

data relating to the at least one entry in the access control group data. Griffin fails to describe or

suggest at least this feature.

Specifically, the system of Griffin assigns a role to a user by matching attributes of a

principal with a role filter associated with the role. See Griffin at paragraph [0038]. When the

principal attempts to access a resource, the system accesses the role associated with the principal,

determines whether a capability included in the role defines access to the resource, and allows

the user to access the resource if the access criteria defined by the capability is met. See Griffin

at paragraphs [0038], [0041], and [0047]. In the system of Griffin, roles are related to

characteristics of a principal and capabilities are related to characteristics of a resource. Because

the access control data described in Griffin includes either characteristics associated with

principals or characteristics associated with resources, Griffin does not describe or suggest

access control group data that includes an entry that includes both a user characteristic for use in

determining at least one entry in user access data relating to the entry in the access control group

data and an object characteristic for use in determining at least one entry in the data object access

data relating to the entry in the access control group data.

Therefore, Griffin does not describe or suggest access control group data that includes at

least one entry in the access control group data including a user characteristic for use in

determining at least one entry in the user access data relating to the at least one entry in the

access control group data and an object characteristic for use in determining at least one entry in

the data object access data relating to the at least one entry in the access control group data, as

recited in independent claim 1.

Moreover, in the rejection of claim 1, the Office action cites a definition of Database

Management Systems obtained from Wikipedia on April 28, 2007. See final Office action of

May 1, 2007 at page 6. Applicants submit that reliance on the definition of Database

Management Systems in the Wikipedia article is improper at least because the Wikipedia article

is not prior art to the present application. In particular, the present application was filed on

August 18, 2003, which is more than three years prior to the access date of the definition of

Database Management Systems in the Wikipedia article (April 28, 2007). Thus, the definition of

Database Management Systems, or any other portion, of the Wikipedia article is not prior art to

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the present application under any section of 35 U.S.C. § 102 and, therefore, improper to cite in a rejection of the claims in the present application.

Thus, for at least these reasons, Applicants respectfully request reconsideration and withdrawal of the rejection of independent claim 1 and its dependent claims 5-15.

Independent claim 25 recites a user access entry relating to at least one entry in access control group data and a data object access data entry relating to at least one entry in the access control group data. Because Griffin fails to describe or suggest access control group data that includes at least one entry in the access control group data including a user characteristic for use in determining at least one entry in the user access data relating to the at least one entry in the access control group data and an object characteristic for use in determining at least one entry in the data object access data relating to the at least one entry in the access control group data, Griffin also does not describe or suggest a user access entry relating to at least one entry in access control group data and a data object access data entry relating to at least one entry in the access control group data. Accordingly, for the reasons discussed above with respect to claim 1, Applicants request reconsideration and withdrawal of the rejection of independent claim 25.
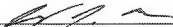
It is believed that all of the pending issues have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this reply should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this reply, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

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No fee is believed due. Please apply any charges or credits to Deposit Account No. 06-1050.

Respectfully submitted,

Date: 7/2/2007

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